IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

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Plaintiff,

Civil Action No. 2:17-cv-00069-JRG-RSP

v.

LG ELECTRONICS USA, INC.,

Defendant.

JURY TRIAL DEMANDED

UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANT TO MOVE, ANSWER, OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT

Defendant LG Electronics USA, Inc. ("LG Electronics") respectfully moves the Court to extend the time for LG Electronics to move, answer, or otherwise respond to Plaintiff's complaint to April 18, 2017. On February 15, 2017, a first Unopposed Application for Extension of Time to Answer Complaint was filed, extending the deadline for LG Electronics' answer to March 18, 2017. On March 16, 2017, a second Unopposed Application for Extension of Time to Answer Complaint was filed, extending the deadline for LG Electronics' answer to April 3, 2017. Due to the parties exchanging information and continuing discussions related to a possible resolution, LG Electronics hereby requests this additional extension of 15 days, extending the deadline for LG Electronics' response to April 18, 2017. In addition, LG Electronics hereby represents to the Court that it will not request additional extensions past April 18, 2017 to move, answer, or otherwise respond to Plaintiff's original complaint [Dkt. No. 1]. Counsel for LG Electronics has consulted with counsel for Plaintiff, and Plaintiff does not oppose this request for an extension.

LG Electronics files this motion without waiving any potential defenses, including those available under Federal Rule of Civil Procedure 12.

Dated: March 30, 2017 Respectfully submitted,

/s/ Harry L. Gillam, Jr.
Harry L. Gillam, Jr.
State Bar No. 07921800

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being notified of the filing of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this 30th day of March, 2017.

/s/ Harry L. Gillam, Jr.
Harry L. Gillam, Jr.